

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION OPIATE
LITIGATION

MDL No. 2804

This Document Relates to:

CASE NO: 1:17-md-2804

All Cases Noted on Attached Exhibit

JUDGE DAN AARON POLSTER

**MASTER STIPULATION AND ORDER DISMISSING WITH PREJUDICE RELEASED
CLAIMS AGAINST ALLERGAN DEFENDANTS**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for the Plaintiff Subdivisions identified in Exhibit A (collectively, “Dismissing Plaintiffs”), and Allergan Defendants¹, that, pursuant to the election of each Dismissing Plaintiff to participate in the Allergan-Texas State-Wide Opioid Settlement Agreement, which is dated May 11, 2023, which is binding on the Dismissing Plaintiffs and the Allergan Defendants, and which has an Effective Date of May 11, 2023, all claims of each Dismissing Plaintiff against any Allergan Defendant are hereby voluntarily **DISMISSED WITH PREJUDICE**, with each party to bear its own costs. The Harris County District Court, 152nd Judicial District (“Texas Opioid MDL”), shall retain jurisdiction with respect to the Allergan–Texas State-Wide Opioid Settlement Agreement to the extent provided in under that Agreement.

Date: May 3, 2024

¹ Allergan Finance, LLC f/k/a Actavis, Inc. f/k/a Watson Pharmaceuticals, Inc., collectively and together with their Released Entities. The Released Entities are each and every entity that is a “Released Entity” as set forth in ¶ 76 of Allergan Public Global Opioid Settlement Agreement, available at <https://nationalopioidsettlement.com/wp-content/uploads/2023/08/Final-Allergan-Settlement-Agreement-8-29-23.pdf>, and in the Allergan–Texas Statewide Opioid Settlement Agreement as an Addendum dated May 11, 2023.

Respectfully submitted,

/s/ Jeffrey B. Simon

Jeffrey B. Simon
TX State Bar No. 00788420
SIMON GREENSTONE PANATIER, P.C.
901 Main Street, Suite 5900
Dallas, Texas 75202
Tel: 214-276-7680/ Fax: 214-276-7699
jhsimon@sgptrial.com

*On behalf of the Court-Appointed Plaintiffs' Steering
Committee, Chair*

KIRKLAND & ELLIS LLP

/s/ Rebecca Fitzpatrick

Rebecca Fitzpatrick
300 North LaSalle, Chicago, IL 60654
Telephone: (312) 862-2000
Fax: (312) 862-2200
james.hurst@kirkland.com
rebecca.fitzpatrick@kirkland.com

Wesley Hill
Tex. Bar No. 24032294
Brett F. Miller
Tex. Bar No. 24065750
WARD, SMITH & HILL, PLLC
1507 Bill Owens Parkway
Longview, Texas 75604
Telephone: (903) 212-3937
Facsimile: (903) 757-2323
wh@wsfirm.com
bmiller@wsfirm.com

Counsel for Allergan Defendants

SO ORDERED this 6th Day of May, 2024.

s/Dan Aaron Polster

Hon. Dan Aaron Polster
United States District Judge